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October 7, 2020

**VIA ECF**

Honorable Andrew L. Carter  
United States District Judge  
United States Courthouse  
40 Foley Square  
New York, New York 10007

MEMO ENDORSED


Re: *Piligian v. Icahn School of Medicine at Mount Sinai*, 17-CV-1975 (ALC) (SDA)

Dear Judge Carter:

We represent plaintiff George Piligian, M.D. We write jointly with the Defendant in the above-referenced case pursuant to the Court's September 28, 2020 order that the Parties provide the Court with a joint status report. We also write (1) to request an extension of time to file the Joint Pre-Trial Order until January 15, 2021 (Dkt. Nos. 82 and 83); and (2) requesting leave to update Plaintiff's economic expert report and Defendant's rebuttal economic expert report.

Were it not for the exigencies of the coronavirus pandemic, the case would be trial ready, subject to submission of pre-trial materials. Per the Court's Individual Rules of Practice Rule 4(A), the Parties have 30 days from the September 28, 2020 Order and Decision to submit their Joint Pre-Trial Order. The Parties jointly request a 79-day extension, or until January 15, 2021, to submit the joint Pre-Trial Order. The reason for the request is that because neither party is in a position to conduct a live jury trial at this time and preparation of the Pre-Trial Order itself requires sustained office exposure. Both parties agree to an extension of the 30-day time period. In addition, Plaintiff seeks permission to update his expert report regarding his economic damages and Defendant seeks an opportunity to update its rebuttal report. The additional time will also allow the Parties to discuss settlement and, if needed, request a settlement conference before Magistrate Judge Aaron.

We thank the Court for its time and consideration.


SO ORDERED:  
  
HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE

October 27, 2020

BELDOCK LEVINE & HOFFMAN LLP

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October 7, 2020  
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Respectfully submitted,



Luna Droubi

cc: All Parties (via ECF)